

CLIFFORD A. KATZ
PLATZER, SWERGOLD, LEVINE,
GOLDBERG, KATZ & JASLOW, LLP
Counsel for JP Morgan Chase Bank NA
475 Park Avenue South, 18th Floor
New York, New York 10016
(212) 593-3000

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
In re

Chapter 11

PRETTY GIRL OF FORDHAM ROAD CORP.
d/b/a PRETTY GIRL,

Case No. 17-11600 (SHL)

Debtor.

-----x

**LIMITED OBJECTION OF JP MORGAN CHASE BANK TO THE ENTRY OF A
FINAL ORDER AUTHORIZING CASH COLLATERAL**

JP Morgan Chase Bank NA (“Chase”), secured creditor of Pretty Girl of Fordham Road Corp. (the “Debtor”), by and through its undersigned counsel, hereby submits this limited objection (the “Objection”) to the proposed Final Order Authorizing Use of Cash Collateral and related relief and in support of its Objection, Chase represents as follows:

BACKGROUND

1. On June 9, 2017 (the “Filing Date”) the Debtor filed for relief pursuant to Chapter 11 of the Bankruptcy Code.
2. The Debtor has been operating as a debtor in possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code. No Committee of Unsecured Creditors has been appointed in the Chapter 11 proceeding to date.
3. Prior to the Filing Date, the Debtor and Chase entered into a certain Commercial Guaranty and Security Agreement, securing the obligations of the Debtor to Chase. The Debtor’s obligations under the Commercial Guaranty are secured by substantially all of its property,

including its inventory, chattel paper, accounts receivable, general intangibles, and proceeds or products thereof (the “Prepetition Collateral”).

4. On June 9, 2017 the Debtor moved before this Court for the entry of an Interim and Final Order; (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, and (III) Scheduling a Final Hearing on the Motion (the “Motion”).

5. On June 14, 2017, the Court entered the Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, and (III) Scheduling a Final Hearing on the Motion (the “Interim Order”).

6. On June 23, 2017, the Court entered the Second Interim Order Authorizing Use of Cash Collateral and Granting Adequate Protection (the “Second Interim Order”), which authorized the Debtor to continue to use Cash Collateral through July 11, 2017 and adjourned the Final Hearing to July 11, 2017.

7. On July 11, 2017, the Court entered the Third Interim Order Authorizing Use of Cash Collateral and Granting Adequate Protection (the “Third Interim Order”) which authorized the Debtor to continue to use Cash Collateral through July 26, 2017 and adjourned the Final Hearing to July 26, 2017 and adjourned the Final Hearing to July 26, 2017.

8. On August 2, 2017, the Court entered the Fourth Interim Order Authorizing Use of Cash Collateral and Granting Adequate Protection (together with the Interim Order, the Second Interim Order, the Third Interim Order, and the Fourth Interim Order, collectively the (“Prior Interim Orders”), which authorized the Debtor to continue to use Cash Collateral through August 8, 2017 and adjourned the Final Hearing to August 8, 2017.

LIMITED OBJECTION

10. Chase and the Debtor have been negotiating in good faith, the terms of a Final Order but as of the date of this limited Objection, Chase and the Debtor have not yet fully reached an agreement with respect to the terms of a Final Order acceptable to Chase.

11. Chase has and will continue to negotiate with the Debtor in good faith with the hope that a consensual Final Order may be reached prior to the date of the hearing on the Final Order, but reserves the right to object to a Final Order to the extent that it is unable to reach a consensual resolution with the Debtor with respect to the terms of a Final Order.

12. Accordingly, Chase hereby files this Limited Objection to the Debtor's entry of a Final Order to preserve its right to object in the event the parties are unable to reach terms acceptable to Chase and the Debtor.

WHEREFORE, Chase respectfully submits this limited Objection to preserve its right to object to the entry of a Final Order, together with such other and further relief the Court finds just, proper and equitable.

Dated: New York, New York
August 2, 2017

**Platzer, Swergold, Levine,
Goldberg, Katz & Jaslow, LLP
Attorneys for JP Morgan Chase Bank NA**

By: /s/ Clifford A. Katz
Clifford A. Katz, Esq.
475 Park Avenue South, 18th Fl
New York, New York 10016
(212) 593-3000
ckatz@platzerlaw.com